

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

FILED IN COURT
ASHEVILLE, NC

DEC 03 2024

U.S. DISTRICT COURT
W. DISTRICT OF N.C.

UNITED STATES OF AMERICA

v.

ANUJ DINESHKUMAR PATEL

DOCKET NO. 1:24-cr-009-MR-WCM
BILL OF INDICTMENT

Violations:

18 U.S.C. § 2422(b)

18 U.S.C. § 2251(a)

18 U.S.C. § 2252A(a)(2)(A)

18 U.S.C. § 2252A(a)(5)(B)

THE GRAND JURY CHARGES:

COUNT ONE

On or about September 27, 2021, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWO

On or about April 1, 2022, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT THREE

Between on or about November 30, 2022, and December 3, 2022, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT FOUR

On or about June 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

using a facility and means of interstate and foreign commerce, attempted to, and did, knowingly persuade, induce, and entice an individual under the age of eighteen to engage in sexual activity for which any person can be charged with a criminal offense, including Production of Child pornography, 18 U.S.C. § 2251(a).

In violation of Title 18, United States Code, Section 2422(b).

COUNT FIVE

On or about June 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

attempted to, and did, employ, use, persuade, induce, and entice a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct using materials that had been mailed, shipped, or transported in and affecting interstate and foreign commerce by any means, including by computer, and the visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and (e).

COUNT SIX

On or about June 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT SEVEN

On or about June 5, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

knowingly received and attempted to receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT EIGHT

On or about June 6, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT NINE

On or about June 6, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

knowingly received and attempted to receive child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TEN

On or about June 7, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT ELEVEN

On or about June 14, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT TWELVE

On or about June 18, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

did knowingly distribute any child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that has been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(2)(A).

COUNT THIRTEEN

On or about July 18, 2023, in Buncombe County, within the Western District of North Carolina and elsewhere, the defendant,

ANUJ DINESHKUMAR PATEL

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor, that has been shipped and transported using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

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NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 18 U.S.C. § 2253. The following property is subject to forfeiture in accordance with Section 2253:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

The Grand Jury finds probable cause to believe that the following property that was seized on or about July 18, 2023, during the course of the investigation of the offenses herein is subject to forfeiture on one or more of the grounds stated above: one (1) Apple iPhone 8 Plus.

A TRUE BILL

FOREMAN

DENA J. KING
UNITED STATES ATTORNEY


ALEXIS SOLHEIM
ASSISTANT UNITED STATES ATTORNEY